

UNITED STATES BANKRUPTCY COURT  
For the Western District of Virginia

In re:	)	Bankruptcy No. 18-62443-RBC
<b>Bruce Ian Gurley, Debtor</b>	)	
	)	Chapter 13
HSBC Bank et al, Movant	)	
v.	)	
Bruce Ian Gurley, Respondent	)	Filed: December 14, 2018

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**DEBTOR RESPONSE TO PRE-HEARING ORDER**

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Comes now Debtor, Bruce Ian Gurley, appearing in Propria Persona, to comply with the Court's Pre-Hearing Order dated March 14, 2019. Section 5 requires the Debtor to serve upon the Movant and the Court, a statement as to how the Movant can be adequately protected if the stay is to be continued by the Court.

As documented in the Exhibits that the Debtor will be submitting for this hearing, the Debtor has spent nearly the last year requesting that the Movant and its predecessor, Select Portfolio Services validate the debt that it claims he owes. This was done in accordance with the Debtor's rights under the federal guidelines established by RESPA and the FDCPA. This is all documented in the exhibits including the proof that each of these requests were mailed and signed for by the Movant or its agents. All documents indicate that Notice to its agents are notice to the Movant and vice versa. The Movant has yet to comply with the request or any of the stated remedies for neglecting the presentments made to them.

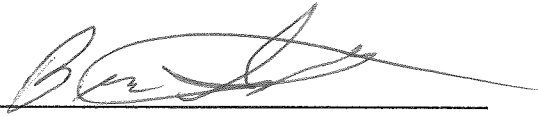
In its Motion, the Movant indicated that this Court had jurisdiction over this issue. The Debtor seeks to have this Court 1) Validate that the Debtor's request for validation of the Movant and if unable, invalidate the Movant's debt if it cannot validate the debt. 2) Validate that the Debtor has not bifurcated the Note and Deed of Trust. One cannot be validated without the other. Using the power of the Court's subpoena and / or the Rule 2004 Examination of the Movant and its predecessors, the Movant must produce the original 'wet signature' documents that is must have in its possession in order to foreclose. Certified copies do not give the Movant the rights that its trying to exercise. 3) Grant the Debtor free and clear title of the subject property if the Movant's proof of claim cannot be verified, along with the power of the Court's Discharge Injunction if the Movant should attempt to transfer its claim or attempt to exercise a claim in any other Court.

Wherefore, Debtor respectfully declines to assert that he has any obligations to the Movant by giving assurances of any type, prior to the hearing.

Dated this 8<sup>th</sup> day of April, 2019.

Respectfully submitted,

Dated: 4-8-2019

By:   
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**CERTIFICATE OF SERVICE**


The undersigned hereby certifies that he served a true and correct copy of the **DEBTOR RESPONSE TO PRE-HEARING ORDER** by placing the same in the United States Mail, first class postage pre-paid, or by email as available, this April 8, 2019 to the following:

Office of the US Trustee,  
210 First Street, Suite 205  
Roanoke, VA 24011

Herbert L. Beskin, Ch. 13 Trustee  
PO Box 2103  
Charlottesville, VA 22902

Shapiro & Brown, LLP  
501 Independence Parkway, Ste 203  
Chesapeake, VA 23320

Dated: April 8, 2019.

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